



# Minnesota Pollution Control Agency

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

US EPA RECORDS CENTER REGION 5



474726

April 19, 2000

Mr. Charles Meyer, City Manager  
City of St. Louis Park  
5065 Minnetonka Boulevard  
St. Louis Park, MN 55416

Mr. Thomas Reilly, Jr., President  
Reilly Industries  
300 North Meridian Street, Suite 1500  
Indianapolis, IN 46204-1763

RE: United States of America, et al. vs. Reilly Tar & Chemical Corporation, et al.  
File No. Civ. 4-89-468, Consent Decree - Remedial Action Plan (CD-RAP)  
Section 7.4.1; Gradient Control System Modifications in the Prairie du Chein/Jordan Aquifer  
Section 7.4.2; W48 Pumping Rate

Dear Mr. Meyer and Mr. Reilly:

The above referenced CD-RAP requires pumping from well W48 (Methodist Hospital well) as part of the Reilly site gradient control system in the Ordovician Prairie du Chein/Cambrian Jordan Aquifer (OPDC/CJDN). Well W48 was previously used to supply cooling water to the hospital. The hospital stopped pumping the well in fall 1991.

The Minnesota Pollution Control Agency (MPCA) and U.S. Environmental Protection Agency (U.S. EPA) (Agencies) staff requested that you prepare a Focused Feasibility Study (FFS), for the replacement of that well, in our letter dated November 12, 1999. An initial response letter was submitted by ENSR, dated December 3, 1999, requesting clarification of some of the language used in the Agencies letter. The FFS for well W48 was submitted to the Agencies within the required 90-day schedule and received on February 16, 2000.

After an initial review of the FFS, the Agencies extended the review period an additional 30 days, stated in our letter dated March 14, 2000. This letter also requested additional information in order to complete review of the FFS. ENSR provided the requested information in a letter dated March 27, 2000.

The FFS evaluated the following three remedial alternatives:

- 1) Reestablish pumping at the Methodist Hospital well (W48);
- 2) Install a replacement well in the vicinity of W48, and
- 3) Establish full time pumping at SLP6.

Mr. Charles Meyer and Mr. Thomas Reilly, Jr.

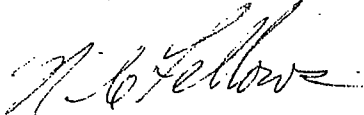
Page 3

April 19, 2000

6. A National Pollution Discharge Elimination System (NPDES) permit is also anticipated. The CD/RAP Section 7.4.3 states that if surface water discharge criteria are exceeded at the gradient control well the city shall implement increased sampling weekly for six weeks. If the mean concentration of the six samples still exceeds the limits, treatment prior to discharge will be necessary. The city will then have 90 days to submit design plans for the treatment system.
7. The Agencies will issue an appropriate document, which will approve the changes to the OPDC/CJDN gradient control system.

We would be pleased to meet with you to discuss the FFS at your request. If you have any questions regarding the project, please feel free to contact Nile Fellows at (651) 296-7299, or Paul Bulger at (651) 296-7827.

Sincerely,



Nile Fellows  
Project Manger  
Site Remediation Section  
Metro District



Darryl Owens  
Remedial Project Manager  
Remedial Response Branch  
U.S. EPA

NF/DO:csa

cc: Mr. Bill Gregg, ENSR Consulting & Engineering